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Counsel for the State of Illinois

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE CATHODE RAY
 TUBE (CRT) ANTITRUST
 LITIGATION

This Document Relates To:

 All Actions

No. CV-07-5944-JST
 MDL No. 1917

**Brooker Declaration in Support of
 the State of Illinois' Motion to File
 Documents on the Public Record**

Date: January 5, 2017
 Time: 2:00 pm
 Court: Courtroom 9, 19th Floor, 450
 Golden Gate Ave., San Francisco, CA
 Judge: Hon. Jon S. Tigar

I, Chadwick O. Brooker, declare:

1. I am an Assistant Attorney General for the Office of the Illinois Attorney General. I have personal knowledge of the matters stated in this declaration and would provide competent testimony if called upon to do so.

1 2. I make this declaration in support of the State of Illinois' Motion to File
2 Documents on the Public Record.

3 3. Exhibit A is a list the State created of documents that have been filed under
4 seal in this litigation.

5 4. Exhibit B is a chart the State created that provides for each declarant a
6 representative sample of the boilerplate in that declarant's declarations filed in
7 supporting of motions to file under seal. Except for two, all declarations were
8 signed by the parties' lawyers.

9 5. Exhibit C is a list the State created of the documents filed under seal for
10 which a compelling reason is required but has not been provided. For these
11 documents, the State seeks an order requiring the filing parties to refile on the
12 public record.

13 6. Exhibit D is a true and correct copy of Seventh Additional Defense of LG
14 Electronics, Inc., Sept. 15, 2015.

15 7. Exhibit E is a true and correct copy of the State of Illinois's Amended
16 Complaint.

17 8. Exhibit F is a true and correct copy of PENAC's Answer to State of Illinois's
18 Amended Complaint.

19 9. Exhibit G is a true and correct copy of the Stipulated Protective Order in
20 *State of Illinois v. Hitachi, Ltd.*, No. 12-CH-35266 (Cir. Ct. Cook Cnty. May 28,
21 2013).

22 10. Exhibit H consists of true and correct copies of (i) a letter from
23 Panasonic to State of Illinois (Aug. 26, 2015); (ii) a letter from Toshiba's Counsel to
24 the State of Illinois (July 10, 2015); and (iii) a letter from Samsung SDI's Counsel
25 to the State of Illinois (Feb. 2, 2016).
26

1 I declare under penalty of perjury under the laws of the United States that the
2 forgoing is true and correct.

3
4 Dated: November 28, 2016

Respectfully submitted,

5 LISA MADIGAN,
6 Attorney General of Illinois

7 By: /s/ Chadwick O. Brooker
8 Chadwick O. Brooker
9 Assistant Attorney General
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